

1 **STEVE SCOW (NSBN 9906)**
KING SCOW KOCH DURHAM LLC
2 11500 S. Eastern Ave., Suite 210
Henderson, NV 89052
3 Telephone: (702) 833-1100
Facsimile: (702) 833-1107
4 Email: sscow@kskdllaw.com
Attorney for Plaintiff

5
6 **JAN K. TOMASIK (NSBN 15104)**
DANIEL A. MANN (NSBN 15594)
COZEN O'CONNOR
7 1180 North Town Center Drive, Suite 260
Las Vegas, NV 89144
8 Telephone: (702) 470-2330
Facsimile: (702) 470-2370
9 Emails: JTomasik@cozen.com;
Danielmann@cozen.com
10 *Attorneys for Defendant*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
14

15 LE MAITRE USA, LLC, a Nevada Corporation,
16 Plaintiff,
17 v.
18 HUMBER-THAMES MARKETING LTD., dba
19 MINERVA, a foreign corporation;
20 Defendant

Case No.: 2:25-cv-00692

**JOINT STATUS REPORT AND
STIPULATION AND [PROPOSED] ORDER
TO STAY DISCOVERY PENDING
RESOLUTION OF MOTION TO DISMISS**

21
22 Plaintiff **Le Maitre USA, LLC** and Defendant **Humber-Thames Marketing Ltd. dba**
23 **Minerva**, by and through their respective counsel of record, hereby submit this Joint Status Report
24 and request that the Court enter an Order staying all discovery in this matter until resolution of
25 Defendant's pending **Motion to Dismiss** (ECF No. 3), pursuant to *Fed. R. Civ. P. 26(c)*.

26 ///

27 ///

28 ///

1 **I. STATUS OF THE CASE**

2 This action is currently pending before the Court. On April 18, 2025, Defendant filed a Motion
3 to Dismiss which is fully briefed and remains pending before the Court. No discovery has commenced,
4 and no discovery schedule has been entered.

5 **II. STIPULATION TO STAY DISCOVERY**

6 The parties stipulate and agree that good cause exists to stay discovery pending resolution of
7 the Motion to Dismiss. Accordingly, the parties jointly request that the Court enter an Order staying
8 discovery in this matter until such time as the Court has ruled on the pending Motion to Dismiss. In
9 the event the Motion to Dismiss is denied in whole or in part, the parties will meet and confer and
10 file a proposed Discovery Plan and Scheduling Order within 14 days of the Court's ruling.

11 **III. CONCLUSION**

12 Accordingly, the parties respectfully request that the Court enter an Order staying all discovery
13 in this case pending the resolution of Defendant's Motion to Dismiss.

14 DATED: May 16, 2025

15 KING SCOW KOCH DURHAM LLC

16
17 By: /s/ Steve Scow

18 Steve Scow (SBN 9906)
19 11500 S. Eastern Ave., Suite 210
Henderson, NV 89052
Attorneys for Plaintiff

20 COZEN O'CONNOR

21
22 By: /s/ Daniel A. Mann

23 Jan K. Tomasik (SBN 15104)
24 Daniel A. Mann (SBN 15594)
25 1180 North Town Center Drive, Suite 260
26 Las Vegas, NV 89144
27 Attorneys for Defendant
28

ORDER

IT IS SO ORDERED. Discovery in this matter is hereby STAYED pending the Court's ruling on Defendant's Motion to Dismiss (ECF No. 3). The parties shall file a proposed Discovery Plan and Scheduling Order within 14 days of the Court's ruling on the Motion to Dismiss, if the case remains active.

Dated: 5-21-25


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2025, I electronically filed the foregoing documents: **JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER TO STAY DISCOVERY PENDING RESOLUTION OF MOTION TO DISMISS**, with the Clerk of the Court by using the CM/ECF system and that foregoing document is being served on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Sherry Harper

An Cozen O'Connor Employee